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9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 \$324,100.00 IN UNITED STATES  
CURRENCY,

15 Defendant.

3:08-cv-0071-ECR-VPC

MOTION FOR ENTRY OF JUDGMENT  
OF FORFEITURE

16 Comes now the plaintiff United States of America, through its undersigned  
17 counsel, and moves this Court for entry of JUDGMENT OF FORFEITURE in this action. This  
18 motion is brought pursuant to Rule 55(b)(2), Fed.R.Civ.P., and is based on the papers and pleadings  
on file in this action. A proposed JUDGMENT OF FORFEITURE is submitted herewith.

19 This is an action in rem to obtain judicial forfeiture of certain funds under 21 U.S.C., section  
20 881(a)(6). The verified complaint alleges that the defendant funds represent proceeds traceable to  
21 the exchange of controlled substances in violation of Title II of the Controlled Substances Act, 21  
22 U.S.C., §§ 801-et seq., and/or is property which constitutes money furnished or intended to be  
23 furnished by a person in exchange for a controlled substance or listed chemical in violation of Title  
24 II of the Controlled Substances Act, 21 U.S.C., §§ 801-et seq.

25 A summons and warrant of arrest in rem was issued by this Court on February 14,  
26 2008. In accordance with the summons and warrant, the defendant property was arrested on

1 April 29, 2008. Public notice of the forfeiture action and arrest was given to all persons and entities  
2 by publication in the Reno Gazette-Journal, compliant with Rule G(4), Supplemental Rules for  
3 Admiralty or Maritime and Asset Forfeiture Claims. Proof of publication has been filed in this  
4 action.

5 United States Marshals Service form USM-285, reflecting service upon the defendant  
6 property, is on file herein. Additionally, United States Marshals Service forms USM-285, reflecting  
7 statutory notice to all known prospective claimants are on file herein.

8 No person or entity filed a claim, an answer, or any other responsive pleading within the time  
9 permitted by Rule G(5) of the Supplemental Rules for Certain Admiralty or Maritime and Asset  
10 Forfeiture Claims. Default was entered on September 24, 2008.

11 WHEREFORE, it is requested that the judgment of forfeiture be entered consistent  
12 with the proposed JUDGMENT submitted herewith.

13 Respectfully submitted,

14 GREGORY A. BROWER  
15 United States Attorney

16 Greg Addington  
17 GREG ADDINGTON  
18 Assistant United States Attorney  
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1 No claim, answer, or other responsive pleading has been filed on behalf of any person.  
2 Default was entered on September 24, 2008, of the defendant funds, specified individuals and  
3 entities, and all other persons or entities who claim an interest in the defendant property.

4 Now, therefore, good cause appearing, it is hereby ORDERED, ADJUDGED, AND  
5 DECREED that Judgment be and is entered against the defendant

6 \$324,100.00 IN UNITED STATES CURRENCY  
7 and against all persons and/or entities, having any interest in such property and that the defendant  
8 property be, and the same is, hereby forfeited to the United States of America and no right, title, or  
9 interest in the defendant property shall exist in any other party. The defendant property shall be  
10 disposed of according to law.

11 Date: October 1, 2008

  
UNITED STATES DISTRICT JUDGE